

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

IKE ANAELE

a/k/a Issaac W. Anaele,

Defendant.

: Hon. Joseph A. Dickson

: Mag. No. 13-6595

: **CERTIFICATION OF COUNSEL IN**  
: **SUPPORT OF NOTICE OF MOTION TO**  
: **WITHDRAW AS COUNSEL OF RECORD**

STACY A. BIANCAMANO, of full age, certifies and says:

1. I am an attorney at law admitted to practice before this Court.

2. I am fully familiar with the facts of this case and respectfully submit this  
Certification in support of my motion to be relieved as counsel.

3. I was appointed CJA counsel for defendant Ike Anaele in the matter of *United States v. Ike Anaele*, Crim. No. 2:13-mj-06595-JAD-1 on April 16, 2013.

4. I was also appointed for defendant Ike Anaele in the matter of *United States v. Ike Anaele*, Crim. No. 10-0109-001, by United States District Court Judge Renee Marie Bumb on a violation of his supervised release on October 29, 2013. Mr. Ike Anaele was previously represented by this office in his substantive case before Judge Bumb. In an effort to further continuity of representation, the respective Courts appointed this office as CJA counsel in both matters.

5. During the course of my representation of Mr. Ike Anaele in both matters, I have met with him on multiple occasions at the Essex County Jail to review and discuss the nature of the charges as well as the evidence regarding the criminal complaint and the violation petition. We have thoroughly reviewed all of the discovery and discussed all possible defenses. He has

been provided copies of all the discovery provided by the Government to date in this matter in order to meaningfully discuss the charges and his defenses. We have reviewed his sentencing exposure both by statute and pursuant to the advisory federal sentencing guidelines. I have presented to him a plea offer negotiated and conveyed by the United States Attorney's Office. We have participated in at least one show and tell at United States Attorney's Office where Mr. Ike Anaele was shown the evidence in the Government's case. In sum, Mr. Ike Anaele has been more than adequately advised of the nature of the charges, his sentencing exposure and all defenses.

6. In this regard, the Court approved hiring of an investigator to assist in our preparation of our case. The investigator has tracked down leads, obtained his state file (as he was first charged in Essex County) and conducted interviews of potential witness. This information was conveyed and discussed with Mr. Ike Anaele on at least 2 occasions at the Essex County Jail.

7. The Government sought to have Mr. Anaele's violation petition amended to include additional conduct not originally alleged as well as to conduct the hearing prior to his trial on the substantive charge which is the basis for the violation. I researched and objected to this via letter to Judge Bumb. I have reviewed and discussed same with Mr. Ike Anaele. The continuance order in his case is due to expire on December 31, 2013 and it is anticipated Mr. Ike Anaele's case will be presented to the Grand Jury.

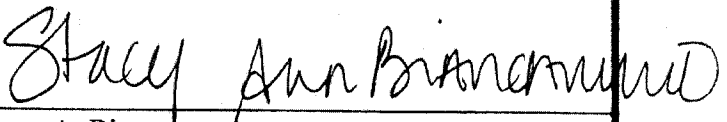
8. In sum, I have worked tirelessly to represent Mr. Ike Anaele. He is more than adequately informed of his charges, his exposure and all defenses. All this has been met with open hostility and anger toward myself from Mr. Ike Anaele. He has repeatedly and continually been disrespectful, openly hostile and verbally abusive toward me and my office staff.

9. To say the least, during the continuous course of representation of Mr. Anaele, my ability to effectively communicate with him has become increasingly difficult.

10. Based on my true belief at this time, the attorney-client relationship has deteriorated to such an extent that effective communication and representation is no longer possible.

11. Under these circumstances, I respectfully request this Court to relieve me as counsel for Mr. Anaele and to appoint substitute counsel to represent him in this matter.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

  
Stacy A. Biancamano

Dated: November 22, 2013